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6 **THE HONORABLE THOMAS O. RICE**

7 **UNITED STATES DISTRICT COURT**  
8 **EASTERN DISTRICT OF WASHINGTON**

9 ANDRES BUSSO VIDALES,  
individually as biologic father of  
10 CAMERON AYERS (deceased),

11 Plaintiffs,

12 v.

13 KAITI WILKINS, individually, and in  
her official capacity as East Wenatchee  
Police Officer; CASSANDRA SPERLE,  
14 individually, and in her official capacity  
as Washington State Department of  
15 Corrections Officer; CITY OF EAST  
WENATCHEE; RANDY HARRISON,  
16 individually, and in his official capacity  
as East Wenatchee Police Chief, JOHN  
17 and JANE DOE OFFICERS 1-5, of the  
East Wenatchee Police Department;  
18 STATE OF WASHINGTON,  
DEPARTMENT OF CORRECTIONS;  
19 RICHARD MORGAN, individually,  
and in his official capacity as Secretary  
20 of The Washington State Department of  
Corrections; JOHN and JANE DOE  
21 OFFICERS 105, of the Department of  
Corrections,

22 Defendants.

NO. 2-18-cv-00056-TOR

STIPULATION AND ORDER  
OF DISMISSAL

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DISMISSAL

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ATTORNEY GENERAL OF WASHINGTON  
Torts Division  
1116 West Riverside  
Spokane, WA 99201-1194  
509-456-3123

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff,  
 2 ANDRES BUSSO VIDALES, individually as biologic father of CAMERON  
 3 AYERS (deceased), acting by and through PHILIP SAFAR and STEPHEN L.  
 4 BULZOMI, and the Defendants, State of Washington, acting by and through  
 5 Robert W. Ferguson, Attorney General, and DEREK TAYLOR, Assistant  
 6 Attorney General, that the above-entitled action as to Defendants RICHARD  
 7 MORGAN, CASSANDRA SPERLE and WASHINGTON STATE  
 8 DEPARTMENT OF CORRECTIONS may be dismissed with prejudice and  
 9 without costs, this matter having been fully settled and compromised between the  
 10 Plaintiff and Defendants Richard Morgan, Cassandra Sperle and Washington  
 State Department of Corrections.

11 DATED this 3rd day of December, 2018.

12 ROBERT W. FERGUSON  
 13 Attorney General

14 s/Derek Taylor  
 15 DEREK TAYLOR, WSBA No. 46944  
 16 Assistant Attorney General  
 17 Attorneys for Defendants Washington  
 State Department of Corrections,  
 Cassandra Sperle, and Richard Morgan

18 SAFAR LAW OFFICE

19 s/Philip Safar  
 20 PHILIP SAFAR, WSBA #17469  
 21 Attorney for Plaintiff  
 22

EVERGREEN PERSONAL INJURY  
COUNSEL

s/Stephen L. Bulzomi  
STEPHEN L. BULZOMI, WSBA #15187  
Attorney for Plaintiff

STIPULATION AND ORDER OF  
DISMISSAL

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ATTORNEY GENERAL OF WASHINGTON  
Torts Division  
1116 West Riverside  
Spokane, WA 99201-1194  
509-456-3123

**ORDER**

THIS MATTER having come before the undersigned judge of the above-entitled Court, based on the foregoing stipulation, now, therefore,

IT IS HEREBY ORDERED That Defendants Richard Morgan, Cassandra Sperle and Washington State Department of Corrections shall be dismissed from the above-entitled action with prejudice and without costs or interest to any party.

DONE IN OPEN COURT this 3rd day of December, 2018.

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JUDGE THOMAS O. RICE

Presented by:

ROBERT W. FERGUSON  
Attorney General  
ROBERT W. FERGUSON  
Attorney General

Approved as to Form and  
Notice of Presentation Waived:

SAFAR LAW OFFICE

\_\_\_\_\_  
s/Derek Taylor  
DEREK TAYLOR, WSBA No. 46944  
Assistant Attorney General  
Attorneys for Defendants Washington  
State Department of Corrections,  
Cassandra Sperle, and Richard Morgan

\_\_\_\_\_  
s/Philip Safar  
Philip Safar, WSBA #17469  
Attorney for Plaintiff  
  
EVERGREEN PERSONAL INJURY  
COUNSEL

\_\_\_\_\_  
s/Stephen L. Bulzomi  
STEPHEN L. BULZOMI, WSBA  
#15187  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that I electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Safar Law Office  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 3rd of December, 2018, at Spokane, Washington.

ROBERT W. FERGUSON  
Attorney General

s/Derek Taylor  
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